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September 21, 2018

VIA ECF

Theodore D. Chuang, District Judge
United States District Court, District of Maryland
6500 Cherrywood Lane, Suite 245A
Greenbelt, MD 20770

Re: DISH Network L.L.C. v. Dima Furniture Inc. et al., Civil Action No. 8:17-cv-03817-TDC (D. Md.)

Dear Judge Chuang:

I represent Plaintiffs DISH Network L.L.C. (“DISH”) in the above referenced action against Defendant Tareq Hasweh (“Hasweh”).¹ DISH submits this letter pursuant to the case management order (Dkt. 10), requiring a pre-motion notice and pre-motion conference prior to filing any motion.

DISH seeks to file a motion for Clerk’s entry of default against Hasweh pursuant to Fed. R. Civ. P. 55(a). On August 28, 2018, Hasweh was served by a process server in accordance with Articles 6 and 7 of the Jordanian Civil Procedures Law No. 24 of 1988 and its amendments (the “Jordan Civil Procedures Law”), by hand delivering copies of the summons and DISH’s first amended complaint to Hasweh in Amman, Jordan. (Dkt. 28.) Pursuant to Article 7 of the Jordan Civil Procedures Law, “[t]he service of judicial documents is to be effected by delivering a copy of the documents which are to be served to the [person] required to be served, wherever he may be found, unless otherwise stated.” Pursuant to Article 6 of the Jordan Civil Procedures Law, “[e]very service of process must take place by means of process servers unless the law states otherwise, and he who undertakes the service of process must provide an account of how the service of process took place, endorsed by his name and signature.” Service in this manner was proper under Fed. R. Civ. P. 4(f)(2).

¹ Hasweh is the only remaining defendant in this action. On May 23, 2018, a final judgment and permanent injunction was entered against Defendants Dima Furniture Inc. and Mohammad Yusif. (Dkt. 23.)

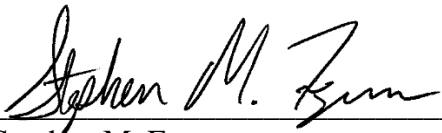
The applicable time for Hasweh to respond to the complaint has passed. *See* Fed. R. Civ. P. 12(a)(1)(A)(i). To date, Hasweh has not filed an answer or other responsive pleading or requested additional time to do so.

Hasweh is not a minor, incompetent, or exempt under the Servicemembers' Civil Relief Act. (*See* Dkt. 28 (35-40 years old and served in Amman, Jordan); Dkt. 17 ¶¶ 1, 5, 14-35 (Resident of Jordan and copyright infringement)). The Clerk should enter default against Hasweh.

DISH seeks authorization to file a motion for Clerk's entry of default against Hasweh.

Sincerely,

HAGAN NOLL & BOYLE LLC



Stephen M. Ferguson